

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

THOSE CERTAIN UNDERWRITERS AT)	
LLOYD'S LONDON, SUBSCRIBING TO)	
CERTIFICATE NO. SUAWSD50147-2001,)	
)	
Plaintiff,)	Case No.: 4:23-cv-00099-JMB
v.)	
)	JURY TRIAL DEMANDED
U-DRIVE ACCEPTANCE CORPORATION,)	
INC., and DEBRA SUE HAMMONS,)	
)	
Defendants.)	

ANSWER

COMES NOW Defendant, U-DRIVE ACCEPTANCE CORPORATION, INC., by and through its attorneys, BETH C. BOGGS and BOGGS, AVELLINO, LACH & BOGGS, L.L.C., and for its Answer, states as follows:

1. Defendant admits that this action is in the nature of a declaratory judgment action regarding coverage. Except as expressly admitted herein, Defendant denies the remaining allegations contained in Paragraph 1.
2. Defendant has insufficient knowledge to form a belief as to the truth of the allegations contained in Paragraph 2 and, therefore, denies same and demands strict proof thereof.
3. Defendant admits the allegations contained in Paragraph 3.
4. Defendant admits the allegations contained in Paragraph 4.
5. Defendant admits the allegations contained in Paragraph 5.
6. Defendant has insufficient knowledge to form a belief as to the truth of the

allegations contained in Paragraph 6 and, therefore, denies same and demands strict proof thereof.

7. Paragraph 7 contains legal conclusions rather than factual allegations and, as such, Defendant makes no answer thereto.

8. Paragraph 8 contains legal conclusions rather than factual allegations and, as such, Defendant makes no answer thereto.

9. Defendant states that the policy speaks for itself.

10. Defendant admits the allegations contained in Paragraph 10.

11. Defendant admits the allegations contained in Paragraph 11.

12. Defendant states that the counterclaim speaks for itself.

13. Defendant states that the counterclaim speaks for itself.

14. Defendant states that the counterclaim speaks for itself.

15. Defendant states that the counterclaim speaks for itself.

16. Defendant states that the counterclaim speaks for itself.

17. Defendant states that the counterclaim speaks for itself.

18. Defendant states that the counterclaim speaks for itself.

19. Defendant states that the counterclaim speaks for itself.

20. Defendant states that the counterclaim speaks for itself.

21. Defendant states that the counterclaim speaks for itself.

22. Defendant states that the counterclaim speaks for itself.

23. Defendant has insufficient knowledge to form a belief as to the truth of the allegations contained in Paragraph 23 and, therefore, denies same and demands strict proof

thereof.

24. Defendant states that the policy speaks for itself.
25. Defendant states that the policy speaks for itself.
26. Defendant states that the policy speaks for itself.
27. Defendant states that the policy speaks for itself.
28. Defendant states that the policy speaks for itself.
29. Defendant states that the policy speaks for itself.
30. Defendant states that the policy speaks for itself.
31. Defendant states that the policy speaks for itself.
32. Defendant states that the policy speaks for itself.
33. Defendant states that the policy speaks for itself.
34. Defendant admits the allegations contained in Paragraph 34.
35. Defendant admits the allegations contained in Paragraph 35.
36. Defendant admits the allegations contained in Paragraph 36.
37. Defendant admits the allegations contained in Paragraph 37.
38. Defendant admits the allegations contained in Paragraph 38.

COUNT I

39. Defendant incorporates by reference its answers to Paragraphs 1 through 38, as if fully set forth herein.

40. Defendant states that the counterclaim speaks for itself.
41. Defendant states that the counterclaim speaks for itself.
42. Defendant denies the allegations contained in Paragraph 42.

43. Defendant denies the allegations contained in Paragraph 43.
44. Defendant denies the allegations contained in Paragraph 44.
45. Defendant states that the policy speaks for itself.
46. Defendant denies the allegations contained in Paragraph 46.
47. Defendant states that the counterclaim speaks for itself.
48. Defendant denies the allegations contained in Paragraph 48.
49. Defendant denies the allegations contained in Paragraph 49.
50. Defendant denies the allegations contained in Paragraph 50.
51. Defendant denies the allegations contained in Paragraph 51.
52. Defendant denies the allegations contained in Paragraph 52.
53. Defendant denies the allegations contained in Paragraph 53.
54. Defendant denies the allegations contained in Paragraph 54.
55. Defendant denies the allegations contained in Paragraph 55.
56. Defendant denies the allegations contained in Paragraph 56.

WHEREFORE, having fully answered Plaintiff's Complaint, Defendant prays that the Complaint be dismissed and that Defendant be awarded its costs incurred herein.

DEFENDANT DEMANDS TRIAL BY JURY

Respectfully submitted,

U-DRIVE ACCEPTANCE CORPORATION, INC.

By: /s/ Beth C. Boggs

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CERTIFICATE OF SERVICE

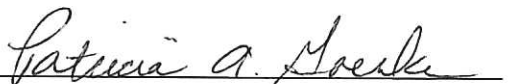
The undersigned hereby certifies that a true and correct copy of the foregoing document was electronically filed with the Clerk of the United States District Court, Eastern District of Missouri, by using the Court's CM/ECF Electronic Filing System this 26th day of March, 2023, with an electronic copy to be served by operation of the Court's electronic filing system upon the following:

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